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April 8, 1999

APR 0 8 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 - 12th Street, SW, TW-A325
Washington, DC 20554

RE: CC Docket No. 99-35, Local Number Portability
        Tariff Filings of U S WEST Communications

Dear Ms. Salas:

On April 7, 1999, Bill Johnston, Brenda Palmquist and the undersigned,
representing U S WEST, met with Chris Barnekov, Kris Monteith, Jay Atkinson,
John Scott, Raj Kannan, Josephine Simmons, Lloyd Collier, Anna Curtis and
Rhonda Lien of the Competitive Pricing Division to discuss the above-referenced
proceeding. The attached material served as the basis for the discussion.

In accordance with Section 1.1206(a)(2) of the Commission's rules, an original and
one copy of this letter and the attachments are being filed with your office for
inclusion in the public record.

Acknowledgment and date of receipt of this submission are requested. A duplicate of
this letter is attached for this purpose.

Please call if you have any questions.

Sincerely,

BB Nugent/dc

Attachments
CC w/ Attachments:

No. of Copies rec'd _____
List ABCDE

Jay Atkinson	Rhonda Lien
Chris Barnekov	Kris Montieth
Lloyd Collier	John Scott
Anna Curtis	Josephine Simmons
Raj Kannan	

LNP Service Delivery

4/7/99 Discussion Summary

(1) Basis for costs included in U S WEST's tariff filing:

- U S WEST did not apply an overhead loading factor to the end user charge
- U S WEST's filing included Service Delivery headcount based on 1998 actuals, 1999 headcount currently in place and forecast for 2000-2002

(2) High level Comparison of the LNP Local Service Request (LSR) process to Resale and Unbundled Loop

(3) LNP order processing is labor intensive, due to:

- Inaccurate data on the LSRs that are submitted by the CLECs (20% rejected upfront)
- Minimal use of Interconnect Mediated Access (IMA), which would *mechanically* screen for errors at the time the LSRs are submitted
- CLEC's not activating on the due date, causing cancellations and supplemental orders
- The need to coordinate more than 70% of the total orders because:
  ⇒ more than 400 lines are being ported
  ⇒ order is for a conversion from INP to LNP
  ⇒ the 10-digit unconditional trigger cannot be set for Direct Inward Dialing (DID) in any switch type or Remote Call Forwarding (RCF) in a DMS100

(4) LNP order volume has exceeded expectations

- 1.26M numbers ported nationwide; .55M in 1998, .71M through 3/99
- 176,579 numbers ported from USWC; **49,394** in 3/99

LNP Service Delivery

Local Service Request (LSR) Process Comparison

Resale - End Services are Provided by U S WEST facilities

- The LSR is submitted via fax or IMA to the Denver ISC

- The Resale order is written in Cheyenne

- Reseller becomes "provider of record"

- Services remain intact/firewall is established to protect Customer Proprietary Network Info. (CPNI)

- Reseller is billed at discounted rate for resold services and is responsible for direct billing to the end customer

- There is no disconnect activity, and no network involvement in LSR activity

Unbundled Loop (UBL) - Loop is Provided by U S WEST; End Services are Provided by New Service Provider's Facilities

- The LSR is submitted via fax or IMA to the Denver ISC

- The UBL order is written in Duluth and is worked as a designed service

- If there is Local Number Portability (LNP) associated with UBL, a related order is written
    - the UBL and LNP orders have the same Due Date (DD) and Frame Due Time (FDT)
    - the UBL and LNP orders cross-reference each other with a Create Related Order (CRO) Field Identifier
    - the UBL order is worked by Designed Services; the LNP order is worked by the LNP team, same as a standalone/bypass LNP order

LNP Service Delivery

Local Service Request (LSR) Process Comparison

Local Number Portability (LNP) - Numbers are Removed from U S WEST's Switch; End Services are Provided by New Service Provider's Facilities

- The LSR is submitted via fax or IMA to the Denver ISC

- The LNP order is written in Phoenix

- A proactive process is in place for flow-through orders and managed cuts to ensure that the New Service Provider has activated service in their switch - to avoid disconnects in error

Comparison of LNP/UBL Activity

- As of 3/99, 11,000 loops in place versus 240,000 ported numbers (INP & LNP)

- Less than 5% of ported numbers have associated UBLs

- Approximately 97% of UBLs are associated with a ported TN

Interconnect Service Centers

Total LSRs by Product (Version 03.04a)
Date: 04/02/99 Time: 18.18.12

Starting Date: 01/01/99
Ending Date : 03/31/99
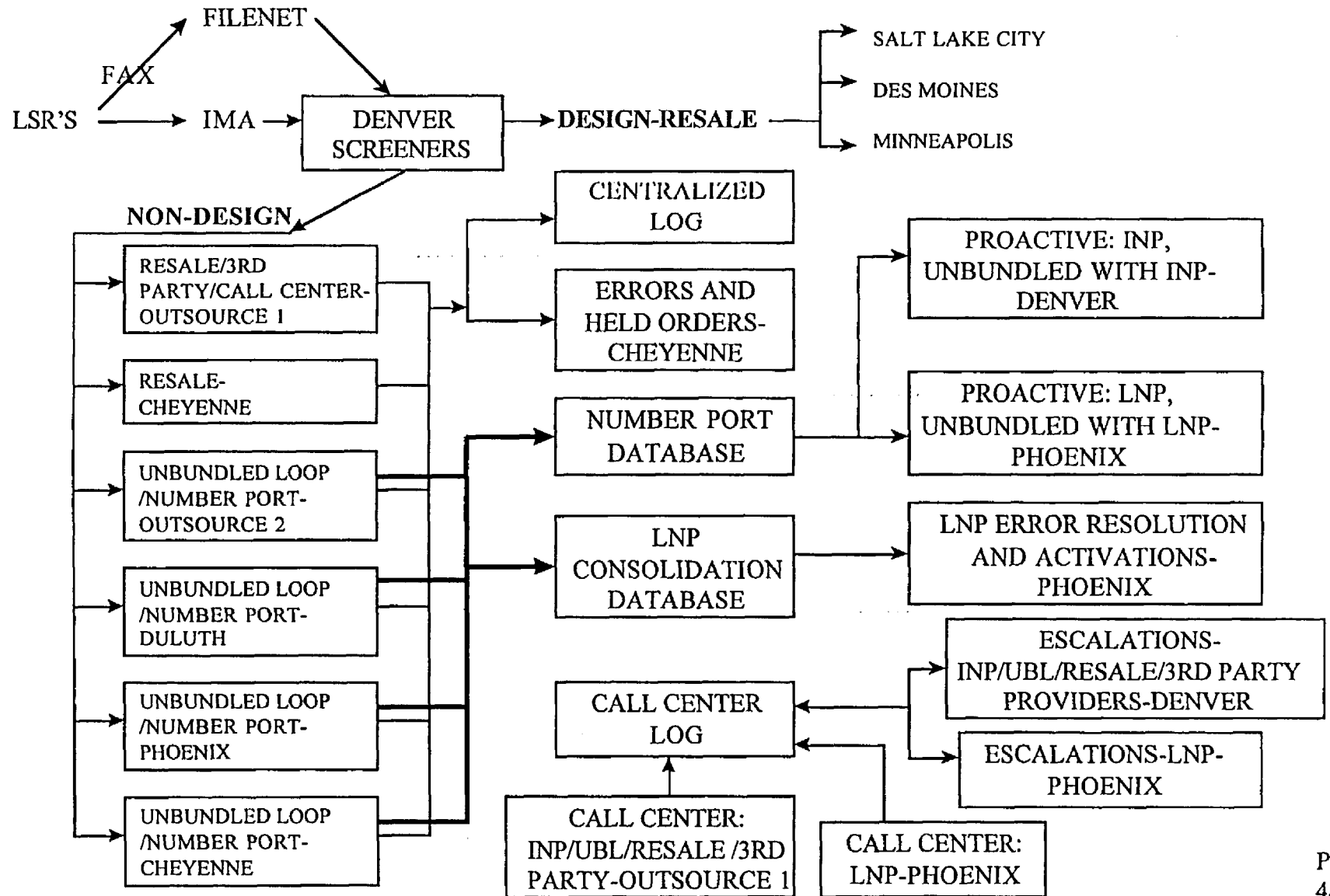Center(s) : ALL
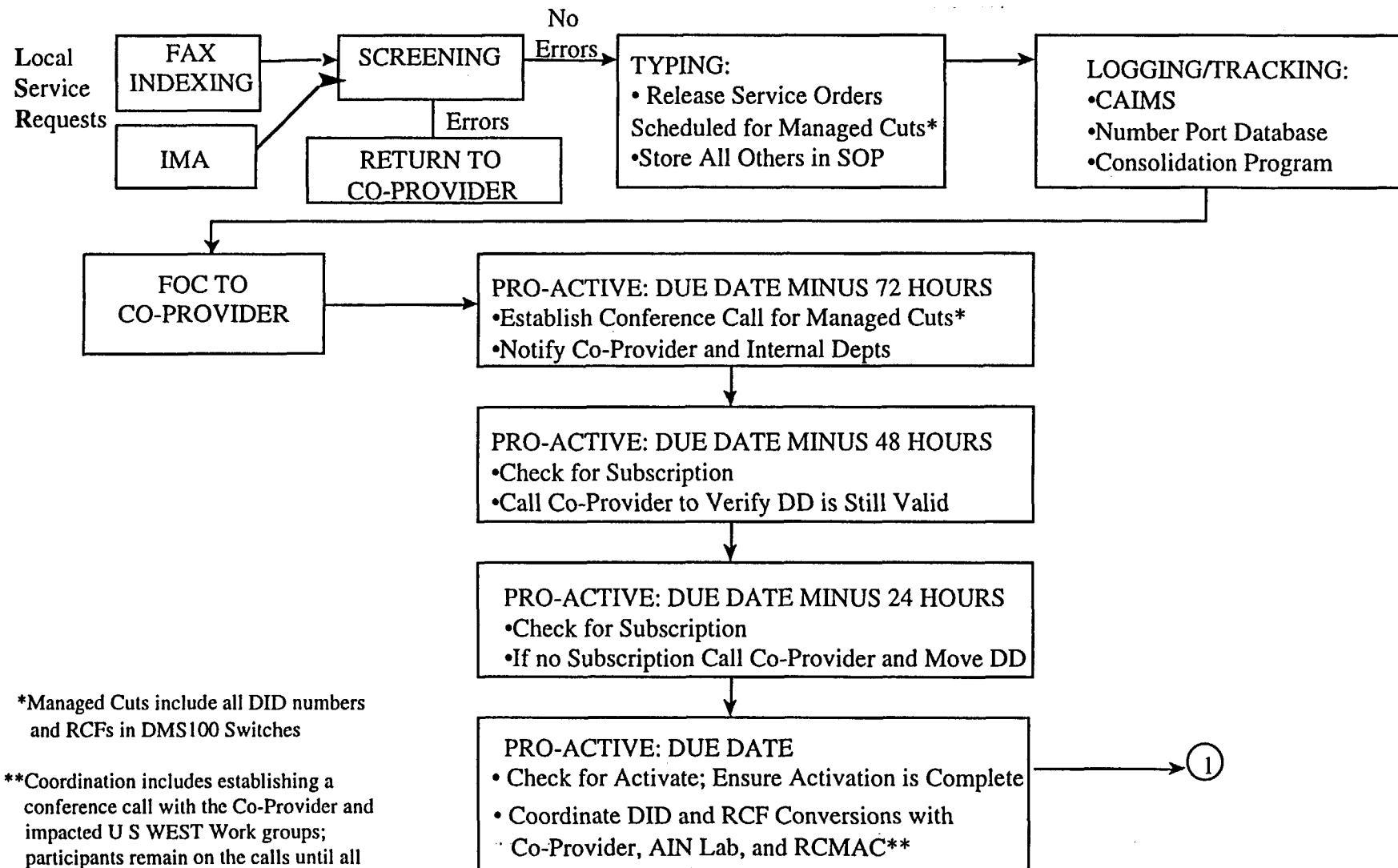Co-Carrier : ALL
Product(s) : ALL
State(s) : ALL

Product	Total Recd	via FAX	via IMA	(C) Cancel	(R) Reject	(P) Pending	(S) Supp	(A) Issued	Orders Issued	Dead-lines Met	Dead-lines Missed	Percent Met
Resale	44437	17399	27038	403	3993	3499	103	36439	39686	35071	1368	96.25
Third Party	1008	977	31	7	55	34	0	912	806	769	143	84.32
Interim Number Portability	2449	2340	109	157	431	19	8	1834	3042	1607	227	87.62
Unbundled	3602	2333	1269	192	474	128	35	2773	7005	2664	109	96.07
Miscellaneous (1)	20	19	1	0	1	9	0	10	11	10	0	100.00
PAL	406	406	0	1	22	62	1	320	319	318	2	99.38
Long Term LNP	9689	9436	253	664	2121	230	73	6601	7583	6059	542	91.79
Product Total	61611	32910	28701	1424	7097	3981	220	48889	58452	46498	2391	95.11

Return to Criteria Selection Page (resets criteria)

INTERCONNECT SERVICE DELIVERY CENTERS

INTERCONNECT SERVICE DELIVERY CENTERS

Local
Service
Requests

| FAX INDEXING |
| IMA |

→ SCREENING

No Errors →

Errors

RETURN TO CO-PROVIDER

TYPING:
• Release Service Orders Scheduled for Managed Cuts*
•Store All Others in SOP

→ LOGGING/TRACKING:
•CAIMS
•Number Port Database
•Consolidation Program

FOC TO CO-PROVIDER

→ PRO-ACTIVE: DUE DATE MINUS 72 HOURS
•Establish Conference Call for Managed Cuts*
•Notify Co-Provider and Internal Depts

↓

PRO-ACTIVE: DUE DATE MINUS 48 HOURS
•Check for Subscription
•Call Co-Provider to Verify DD is Still Valid

↓

PRO-ACTIVE: DUE DATE MINUS 24 HOURS
•Check for Subscription
•If no Subscription Call Co-Provider and Move DD

↓

*Managed Cuts include all DID numbers and RCFs in DMS100 Switches

**Coordination includes establishing a conference call with the Co-Provider and impacted U S WEST Work groups; participants remain on the calls until all numbers are successfully ported.

PRO-ACTIVE: DUE DATE
• Check for Activate; Ensure Activation is Complete
• Coordinate DID and RCF Conversions with
  Co-Provider, AIN Lab, and RCMAC**

→ ①

ERROR RESOLUTION
•SOA/NPAC Errors (Respond Based on Specific Error)
•Activation Reports (Locate Orders, Validate all numbers ported per LSR, Release as appropriate, reset critical dates, EBD to Activate Date and Time
•Manual Completion of LNP with UBL

ESCALATIONS
•Order Status
•Processing
•Repair Reports
•General Q&A

REPAIR***
•OOS (Out of Service)
•Can't Be Called
•NPAC Partial Failure

*** Repair is responsible for issues once the number is activated

LNP SERVICE ORDER PROCESSING

INDEXING

• Verify all pages received/legible

• Separate into individual LSRs

• Acknowledge receipt of individual LSR

SCREENING

• Compare LSR to CSR

• Check for Fatal

• Enter PON and Screener info in CAIMS

• Note BOSS Records of request

• Distribute to Work Group

• Reject if Necessary

ORDER TYPING

• Enter order into Order Processor

• If DID or RCF in a DMS100 Switch distribute order

• If anything other than DID/RCF in a DMS100, store order

• Verify distributed orders/ error free

LOGGING AND TRACKING

•Enter service order information in CAIMS, e.g. Order numbers, Due Date, FOC Date, Frame Due Time,

•Enter PON and service order info. in Number Port Database

•Enter TNs, PON, order numbers in LNP Consolidation Database (used with SOA messages to automatically set triggers)

FIRM ORDER CONFIRMATION (FOC)

•Issue confirmation to Co-Provider, order #'s and due dates

QUALITY CONTROL

•Verify accuracy of orders

•Clear ESOI errors

•Manual completion of UBL/LNP

•E911 Database accuracy

LNP SERVICE ORDER PROCESSING FUNCTIONS Cont'd.

PRO-ACTIVE

•DD-72 hours: Schedule managed conversions (DID and RCF in DMS100), obtain conference call number and communicate to Co-Provider, AIN lab, and RCMAC

•DD-48 hours: Check for Subscription in ASMS, call Co-Provider and verify "Good to Go"

•DD-24 hours: Check for Subscription in ASMS; if no subscription, contact Co-Provider and reschedule Due Date

•DD: Ensure all parties are on managed conversion conference calls, resolve issues as they occur, check for activates on non-managed conversions

ERROR RESOLUTION/ACTIVATION

•Respond to and resolve SOA/NPAC Errors based on specific error message

•Complete Activation Report: locate service order, validate all numbers are ported per LSR, release orders for non-DID/RCF in DMS100, assign appropriate effective billing date, reset critical dates

ESCALATIONS

•Order Status

•Processing Problems

•Repair Reports

•General Q&A regarding CSRs, LSR fields, cycle time, etc.

SERVICE ORDER POSTING

•Clear any CRIS Processing errors

•Respond to billing delays due to processing errors

INTERCONNECT SERVICE DELIVERY CENTERS

ACTIVITY	HEADCOUNT
LSR FAX Indexing	2
Screening	14
Typing:	
• Regular Activity	64
• Conversions	7
Logging/Tracking	1
Pro-Active	6
Quality Control	6
Error Resolution /Activation	7
Escalations	4
Service Order Posting	8
Total ISC	119

Actual Headcount as of 3/1/99.

Definition of Acronyms/Terms:

BOSS/CARS	Business Office Support Systems (CSR, SO & Billing Activity)
CAIMS	Media Storage/Database for Storing Order Activity
CRIS	Customer Records Information System (End User Information & Billing)
CSR	Customer Service Record
DD	Due Date
DID*	Direct Inward Dialing
EBD	Effective Bill Date/Effective Date
ESOI	Fatal Service Order Errors resulting from Facility Assignment
FDT	Frame Due Time
Filenet	System that electronically records all LSRs received via FAX; eliminates paper handling
FOC	Firm Order Confirmation
IMA	Interconnect Mediated Access (electronic interface for exchanging service order information)
LSR	Local Service Request (Order form submitted by New Provider)
NPAC	Number Portabilility Administration Center (Regional Lockheed Martin Database)
OOS	Out of Service
Pro-Active	Communication with the Co-Carriers 72, 48 and 24 hours before the DD and on DD to ensure "good to go" or to reschedule DD/FDT
RCMAC	Recent Change Memory Administration Center
RCF*	Remote Call Forwarding
SOA	Service Order Activator (activates LNP in the regional and local LNP databases)
SOP	Service Order Posting
UBL	Unbundled Loop

* DID and RCF are methods of Interim Number Portability; these services may also be in place for existing customers served by U S WEST switches, requiring coordination with the Co-Carriers and within U S WEST.

Active Subscription Versions Report 4/2/99

Region	Jan-99	Feb-99	Mar-99	Apr-99	May-99	Jun-99	Jul-99	Aug-99	Sep-99	Oct-99	Nov-99	Dec-99	YTD-99
MA	22617	22829	20512	0	0	0	0	0	0	0	0	0	65958
MW	38457	28546	85516	0	0	0	0	0	0	0	0	0	152519
NE	11997	17013	15090	0	0	0	0	0	0	0	0	0	44100
SW	32009	39956	34527	0	0	0	0	0	0	0	0	0	106492
SE	27909	29211	40372	0	0	0	0	0	0	0	0	0	97492
WC	23579	27511	42794	0	0	0	0	0	0	0	0	0	93884
WE	29340	41616	50010	0	0	0	0	0	0	0	0	0	120966
CA	7119	7327	10221	0	0	0	0	0	0	0	0	0	24667
Total	193027	214009	299042	0	0	0	0	0	0	0	0	0	706078

Region	Jan-98	Feb-98	Mar-98	Apr-98	May-98	Jun-98	Jul-98	Aug-98	Sep-98	Oct-98	Nov-98	Dec-98	YTD-98
MA	0	2	11	317	671	1168	4250	6104	5597	15568	13946	24875	72509
MW	2	2	10	95	827	3062	5013	8689	11826	28266	10614	30009	98415
NE	200	1	221	168	719	1276	4224	2711	6970	17830	10770	15340	60430
SW	0	8	3	8	22	299	1368	11186	9300	16049	25201	44438	107882
SE	0	0	0	0	0	0	0	56	1334	5307	8843	18962	34502
WC	0	0	0	0	34	29	2663	7168	8493	17941	42383	24016	102727
WE	0	0	0	0	10	20	363	981	2849	11972	21211	25589	62995
CA	0	0	0	0	0	0	6	657	2139	3249	3963	4645	14659
Total	202	13	245	588	2283	5854	17887	37552	48508	116182	136931	187874	554119

Region
MA = Mid-Atlantic (Bell Atlantic or Bell Atlantic South Area)
MW = Mid-West (Ameritech Area)
NE = Northeast (NYNEX or Bell Atlantic North Area)
SW = Southwest (Southwestern Bell Area)
SE = Southeast (Bell South Area)
WC = West Coast (PacBell Area)
WE = Western Region (U S WEST Area)
CA = Canadian (All of Canada)

The difference between this data and U S WEST Port Out Number is that the U S WEST Port Out Number does not include the Ports between Co-Carriers, such as GTE to MCI, GTS to Winstar, etc. nor does it include the Retail Port-In counts.